

EXHIBIT E

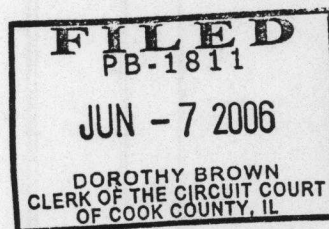
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, PROBATE DIVISION

ESTATE OF

Anna R. Richardson

Alleged Disabled Person

No.: 06 P 000527



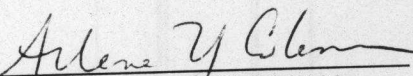
NOTICE OF MOTION

To: See Attached Service

3303.



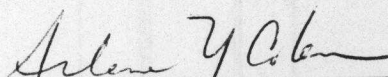
PLEASE TAKE NOTICE that on June 7, 2006, at 10:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Mary Ellen Coghlan, or any other Judge sitting in her stead, in courtroom 1811 of the Richard J. Daley Center, Chicago, Illinois, and then and there present the **Petition for Rule to Show Cause for Contempt Against County Mortgage Services**, a copy of which is attached hereto.


ARLENE Y. COLEMAN

Coleman & Associates
407 South Dearborn
Suite 1475
Chicago, IL 60605
(312) 360-1813

Certificate of Service

The undersigned, an attorney, certifies that this notice and attached petition were served upon the above named individuals by placing a copy of the same in the U.S. Mail, proper postage prepaid before the hour of 5:00 p.m. on the 7th day of June, 2006.


ARLENE Y. COLEMAN

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT. PROBATE DIVISION

ESTATE OF

Anna R. Richardson

Disabled Person

No.: 06 P 000527

SERVICE LIST

Ruben Garcia, Esq.
Rakowski & Garcia LLC
899 Skokie Blvd., Suite 300
Northbrook, Illinois 60063

Charlotte Horton
1220 E. Hyde Park, #3
Chicago, Illinois 60615

Janet McMillian
537 E. 91st Place
Chicago, Illinois 60619

Carol Strong
8318 S. Michigan
Chicago, Illinois 60619

Phyllis Richardson
1647 S. Central Park #2
Chicago, Illinois 60623

Brenda Wailes
1020 E. Hyde Park, 1st Floor
Chicago, Illinois 60615

Gregory Richardson
4800 S. Chicago Beach Drive
Unit 1003 S-Tower
Chicago, Illinois 60615

Ellen Douglass, Esq.
53 West Jackson, Suite 541
Chicago, Illinois 60604

James Trausch,
Jaros, Tittle & O'Toole Limited
20 North Clark, Suite 510
Chicago, Illinois 60602



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, PROBATE DIVISION

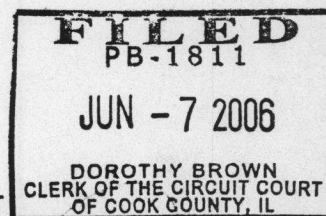
ESTATE OF

Anna R. Richardson

A Disabled Person

No.: 06 P 000527

Calendar
16



PETITION FOR RULE TO SHOW CAUSE FOR CONTEMPT
AGAINST COUNTRY MORTGAGE SERVICES

NOW COMES, the Guardian of the Estate of Anna R. Richardson, CHARLOTTE HORTON, by and through her attorney, Arlene Y. Coleman, and hereby petitions this Honorable Court for a Rule to Show Cause for Contempt against Country Mortgage Services for its failure to respond to a Subpoena Duces Tecum and in support of this petition states as follows:

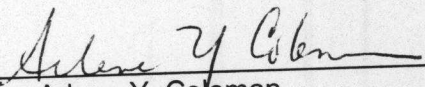
1. On or about October 24, 2005, Freemont Investment and Loan issued a mortgage to the ward, Anna Richardson for remodeling to her property located at 1647 South Central Park Avenue, Chicago, Illinois. In the amount of One Hundred Fifty Thousand Dollars (\$150,000.00)
2. Country Mortgage Services is an independent mortgage broker who assisted Mrs. Richardson in the processing and securing of her mortgage with Freemont Investment.
3. According to the HUD 1 Settlement dated October 24, 2005, Mrs. Richardson received One Hundred Four Thousand, Three Hundred Eighty-eight Dollars and Thirty-eight cents (\$104,388.38) in proceeds from the refinance.
4. Pursuant to a letter of direction the sale proceeds should have been delivered to Mrs. Richardson by the mortgage broker.
5. No proceeds checks were ever delivered to Mrs. Richardson.
6. On February 13, 2006, this Honorable Court appointed petitioner as the Temporary Guardian of the estate of Anna R. Richardson.
7. On March 7, 2006, the guardian through her counsel issued a subpoena duces tecum to deponent Country Mortgage Services, 11 N. Arlington heights Road, Arlington Heights, Illinois for records regarding a mortgage to the ward, Anna R. Richardson. A copy of the subpoena and return receipt of service are attached.
8. The records requested contain pertinent information regarding assets which are owed to the ward, Anna r. Richardson as a result of the refinance.

9. The deponent failed to respond to said subpoena deuces tecum.
10. Deponent has failed to respond to subsequent telephone calls or correspondences from counsel.

WHEREFORE, Petitioner respectfully requests this Honorable Court:

- A. Enter an rule to show cause, directing deponent, Country Mortgage Services and it's officer, to show cause, if any, why it should not be held in contempt of this Court.
- B. Order the deponent to turn over any and all documents pertaining to the application and mortgage for Anna R. Richardson, including the name and contact information of the loan officer assigned to this file.
- C. Award attorney's fees for the filing of this petition.
- D. Grant any further relief that the Court deems appropriate.

Respectfully submitted,
Charlotte Horton, Guardian of the Estate
of Anna R. Richardson, a disabled person


By: Arlene Y. Coleman

Arlene Y. Coleman
A.Y. Coleman & Associates, Inc.
407 S. Dearborn, Suite 1475
Chicago, IL 60605
(312) 360-1813
Atty. Code: 34913

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Mantis. Esq.
1300 W. Higgins Rd
Ste. 209
Park Ridge, IL 60067

COMPLETE THIS SECTION ON DELIVERY

A. Signature

S. Miles

☐ Agent☐ Addressee

B. Received by (Printed Name)

S. Miles

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7004 2510 0001 9694 3267

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

U.S. Postal Service™

CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

PARK RIDGE, IL 60068

Postage \$ 0.39

UNIT ID: 0041

Certified Fee

2.40

Return Receipt Fee
(Endorsement Required)

1.85

Restricted Delivery Fee
(Endorsement Required)

Clerk: X40BPO

Total Postage & Fees

\$ 4.64

Sent To

John Mantis, Esq.

Street, Apt. No.,
or PO Box No.

1300 W. Higgins Rd. Ste 209

City, State, ZIP+4

Park Ridge, IL 60068

PS Form 3800, June 2002

See Reverse for Instructions

7004 2510 0001 9694 3267

2180-Served
 2280-Not Served
 2380-Served By Mail
 Subpoena-Subpoena Duces Tecum

(Rev. 5/27/98) CCG-0006

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ESTATE OF ANNA R. RICHARDSON

Plaintiff,

-vs-

BRIAN RICHARDSON

Defendant.

NO: 06 P 000527

In lieu of appearance, submit documents
 to Atty. Arlene Y. Coleman Via Fax at (312)
 360-1749 and via US Mail to the address below

SUBPOENA DUCES TECUM

To: Country Mortgage Services
 11 N. Arlington Heights Road
 Arlington Heights, Illinois 60004

c/o John Mantis, Esq., Skoubis & Mantis, LLC. 1300 West Higgins Road, Suite 209, Park Ridge, IL 60068

YOU ARE COMMANDED to appear on March 13, 2006 at 11:00 a.m. in Room 1801 to testify before the
 Honorable Judge Coghlan in the Richard J. Daley Center, 50 W. Washington, Chicago, Illinois.

YOU ARE ALSO COMMANDED TO BRING THE FOLLOWING:

- 1) Any and all documents pertaining to the mortgage issued to Anna R. Richardson on October 24, 2005 for the property address: 1647 South Central Park, Chicago, Illinois 60623, which is believed to be in your possession or control or about which you have knowledge.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR
 CONTEMPT OF COURT.

Witnesses:

MAR 07 2006

DOROTHY E. [unclear]

SEAL

Clerk of Court

Atty. No.: 34913

Name: Arlene Y. Coleman

Attorney for: Plaintiff(s)

Address: 407 S. Dearborn, Suite 1475

City: Chicago, IL 60605

Telephone: 312-360-1813

I served this subpoena via certified mail to Country Mortgage Service c/o John Mantis Esq. on 3/07/06.

I paid the witness \$ _____ for witness fee and mileage.

Signed and sworn before me

OFFICIAL SEAL
 JUDY M. MARTIN
 NOTARY PUBLIC STATE OF ILLINOIS
 MY COMMISSION EXPIRES 04-19-07

7th day of March, 2006

Notary Public.

ARLENE Y. COLEMAN & ASSOCIATES

ATTORNEYS AT LAW

April 12, 2006

Via U. S. Mail &
Fax @ (847) 696-0901

Mr. John Mantis
1300 West Higgins Road
Suite 209
Park Ridge, Illinois 60068

Re: *Estate of Anna R. Richardson*
Case No.: 06 P 000527
Subpoena Duces Tecum

Dear Mr. Mantis:

I represent the Guardian of the Estate of Anna Richardson. On or about March 7, 2006, I forwarded a subpoena duces tecum upon you on behalf of your client Country Mortgage Services. Pursuant to the subpoena you were directed to forward documents to me or appear in court to present said records for examination on March 13, 2006. To date I have not received any documentation from you or your client. A copy of the subpoena is enclosed. I have been advised that a mortgage broker assisted in the processing of this loan. Please provide me with the name and contact information of the mortgage broker and the construction company which received funds for rehab of the subject property.

Please contact me upon receipt of this correspondence to arrange for the tender of these records. Otherwise, I will proceed with a Rule to Show Cause or Citation against your client.

Very truly yours,



Arlene Y. Coleman

Enclosure

cc: Charlotte Horton